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Attorneys for Victim

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANASTASSIA KREZOUN,

Defendant.

Case No. 8:23-CR-00042-CJC

VICTIM'S UNOPPOSED *EX PARTE* APPLICATION FOR ORDER SEALING (1) STIPULATION FOR AN ORDER PERMANENTLY SEALING DOCUMENTS IN ACCORDANCE WITH NINTH CIRCUIT ORDER; (2) ATTACHED EXHIBIT TO THE STIPULATION; (3) PROPOSED ORDER ON THE STIPULATION, ALONG WITH ITS ATTACHED EXHIBIT (ECF NO. 100)

[[Proposed] Order Filed Concurrently
Herewith]

1 **PLEASE TAKE NOTICE** that the Victim, by and through his counsel of
2 record, hereby applies *ex parte* for an order sealing ECF No. 100, specifically: (1)
3 Stipulation For An Order Permanently Sealing Documents In Accordance With Ninth
4 Circuit Order; (2) attached Exhibit A to the Stipulation; and (3) Proposed Order on the
5 Stipulation, along with attached exhibit (ECF No. 100) (“Stipulation and Proposed
6 Order”).

7 The Stipulation and Proposed Order should be sealed because it contains and
8 references the same materials that the Ninth Circuit ordered the district court to
9 permanently seal when granting the Victim’s petition for writ of mandamus. *See*
10 Docket No. 98, Order, *In re: John Doe*, No. 24-3422 (9th Cir. Oct. 16, 2024)
11 (ordering the district to “permanently seal the sentencing memorandum and all other
12 provisionally-sealed documents”). The Stipulation and Proposed Order contains and
13 references the same materials subject to the Ninth Circuit’s sealing order, and should
14 accordingly be sealed on that basis.

15 Counsel for the government and counsel for the defendant have both stated by
16 email that they do not object to the relief requested, namely that the Stipulation and
17 Proposed Order (ECF 100) should be sealed in accordance with the Ninth Circuit’s
18 Order.

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20 Dated: December 6, 2024

Respectfully submitted,

SIDLEY AUSTIN LLP

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23 By: /s/ Douglas A. Axel
Douglas A. Axel

24 *Attorneys for Victim*
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DECLARATION OF DOUGLAS A. AXEL

I, Douglas A. Axel, declare and state:

1. I am a partner at the law firm of Sidley Austin LLP, and represent the Victim in the present matter. I have personal knowledge of the matters set forth in this declaration, and if called to testify thereto, I could and would do so competently.

2. For reasons described in the Victim's sealing Application, the Victim requests that the documents filed at ECF 100 all be filed under seal, namely the (1) Stipulation For An Order Permanently Sealing Documents In Accordance With Ninth Circuit Order; (2) attached Exhibit A to the Stipulation; and (3) Proposed Order on the Stipulation, along with attached exhibit, all of which were efiled on December 5, 2024 (ECF No. 100) ("Stipulation and Proposed Order").

3. I conferred by email with AUSA Andrew Roach and Defendant's counsel, Deputy Federal Public Defender Terra D. Castillo Laughton, on December 6, 2024, regarding the filing of the Stipulation and Proposed Order under seal. All parties stated that they do not oppose this application to seal.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration is executed this 6th day of December 2024, in Los Angeles, California.

By: /s/ Douglas A. Axel
Douglas A. Axel